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Attorneys for Defendants
Maryam Ghermazian, an individual and
d/b/a www.saveintheusa.com, and
Technology One Online d/b/a Tech 1,
Technology 1 and Technology One
Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

Adobe Systems Incorporated,)
v.)
Maryam Ghermazian, et al.)
Defendants.)
ALL RELATED CLAIMS)
)
Plaintiff,)
)
Case No. CV11-3882 JSW
**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
[PROPOSED] ORDER AS MODIFIED
HEREIN**
Date: December 2, 2011
Time: 1:30 p.m.
Court: Hon. Jeffrey S. White

PLAINTIFF Adobe Systems Incorporated (“Adobe”), by and through its counsel of record, and Defendants Maryam Ghermazian, an individual and d/b/a www.saveintheusa.com, and

1 Technology One Online d/b/a Tech 1, Technology 1 and Technology One Corporation
2 (collectively "Defendants"), by and through their counsel of record, hereby stipulate and request as
3 follows:

4 WHEREAS Adobe filed its complaint on or about August 8, 2011;

5 WHEREAS counsel for Defendants first contacted counsel for Adobe on or about
6 November 10, 2011, regarding her recent retention by Defendants;

7 WHEREAS counsel for Defendants has indicated that she will accept service for
8 Defendants;

9 WHEREAS an Acknowledgment of Service is being sent to counsel for Defendants on or
10 about November 10, 2011;

11 WHEREAS counsel for Defendants has not yet reviewed the Complaint and will need
12 sufficient time to prepare a response;

13 WHEREAS the return of the Acknowledgment will give Defendants until January 9, 2012,
14 to respond to the Complaint;

15 WHEREAS Defendant Morris Cohen a/k/a Morris Kohanian, an individual and d/b/a
16 www.saveintheusa.com ("Cohen"), remains unserved;

17 WHEREAS Adobe has until December 6, 2011, to serve Defendant Cohen;

18 WHEREAS briefly continuing the Case Management Conference and all corresponding
19 deadlines will provide the Parties with additional time to possibly resolve this matter informally or,
20 alternatively, better brief the Court regarding the Parties' positions and any outstanding issues; and

21 WHEREAS Defendants by agreeing to a continuation of the case management conference
22 do not intend to waive, and expressly reserve any and all rights or defenses, including those based
23 on subject matter jurisdiction, personal jurisdiction or venue.

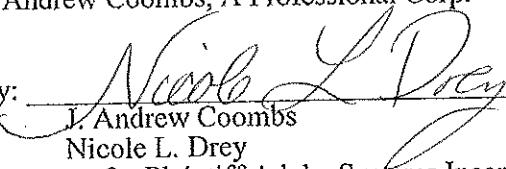
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1 NOW, THEREFORE, Adobe and Defendants respectfully request the Court continue the
2 Joint Case Management Conference for approximately ninety (90) days, or not earlier than March
3 2, 2012.
4

5 IT IS SO STIPULATED.
6

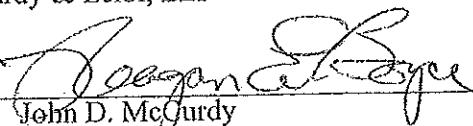
7 DATED: November 10, 2011
8

9 J. Andrew Coombs, A Professional Corp.
10

11 By: 
12 J. Andrew Coombs
13 Nicole L. Drey
14 Attorneys for Plaintiff Adobe Systems Incorporated
15

16 DATED: November 10, 2011
17

18 McCurdy & Leibl, LLP
19

20 By: 
21 John D. McCurdy
22 Reagan E. Boyce
23 Attorneys for Defendants
24 Maryam Ghermazian and Technology One Online
25

26 PROPOSED ORDER
27

28 PURSUANT TO REQUEST, IT IS HEREBY ORDERED that the Case Management Conference
1 March 16, 2012 at 1:30 p.m. A joint case management statement is due on March 9,
2 shall be continued to 2012. If Plaintiff requires additional time to serve Defendant Cohen, they should file
3 the appropriate request with the Court.
4

5 DATED: November 28, 2011
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7 
8 Hon. Jeffrey S. White
9 UNITED STATES DISTRICT JUDGE
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